

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN,
LOSARTAN, AND
IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

*This Document Relates to All Losartan
and Irbesartan Actions*

**Case No. 19-md-2875
MDL No. 2875**

**Honorable Renée Marie Bumb,
Chief District Judge**

**Special Master Judge Thomas
Vanaskie**

**WHOLESALE DEFENDANTS' NOTICE OF MOTION TO STRIKE
PLAINTIFFS' OBJECTIONS TO WHOLESALE DEFENDANTS'
DEPOSITION EXAMINATION OF FACT
WITNESS MICHELLE KELLER**

PLEASE TAKE NOTICE that on October 21, 2024, Wholesaler Defendants in this MDL, by and through their undersigned counsel, shall move for the entry of an Order striking Plaintiffs' Objections to Wholesaler Defendants' Deposition Examination of Fact Witness Michelle Keller. This motion is made to the Hon. Renée Marie Bumb, Chief United States District Judge, pursuant to the Federal Rules of Civil Procedure, Case Management Order No. 20 (Dkt. No. 632), and the applicable Local Rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the Wholesaler Defendants shall rely on the accompanying Memorandum of Law in Support of Wholesaler Defendants' Motion to Strike Plaintiffs' Objections to

Wholesaler Defendants' Deposition Examination of Fact Witness Michelle Keller
and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted
herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested, if
this motion is opposed.

Dated: September 25, 2024

Respectfully submitted,

By: /s/ Jeffrey D. Geoppinger

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 25, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jeffrey D. Geoppinger
Jeffrey D. Geoppinger